

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE:       SLABBED NEW MEDIA, LLC**  
**Debtor**

**CHAPTER 11**  
**CASE NO. 15-50963-KMS**

**ANSWER AND RESPONSE TO MOTION RE: NAMES AND  
ADDRESSES INCORRECTLY ENTERED BY DEBTOR AND FOR  
ADDITIONAL TIME UNDER RULE 2002(P)**

COMES NOW Slabbed New Media, LLC (the “Debtor”), and files this its *Answer and Response to Motion Re: Names and Addresses Incorrectly Entered by Debtor and for Additional Time Under Rule 2002(P)*, filed by Charles Leary and Vaughn Perret (the “Motion”) [DK #107], and in support thereof, would show unto the Court the following, to-wit:

**First Unnumbered Paragraph**

Debtor denies that the creditors mentioned in the First Unnumbered Paragraph of the Motion have never received proper notice in that they respond, when they deem fit, to various pleadings and notices. Accordingly, the purported creditors mentioned in the First Unnumbered Paragraph have waived the issue of proper notice by having entered a general appearance in this case. Further, the purported creditors have, in the past, asserted claims or matters as “Charles Leary, Vaughn Perret and Trout Point Lodge”. Simply naming the three creditors in succession is not an attempt to treat them as a single creditor, it is simply listing them as two persons and one apparent corporate entity.

**Second Unnumbered Paragraph**

The allegations, inferences and conclusions contained in the Second Unnumbered Paragraph are denied except that the Debtor has listed Charles Leary and Vaughn Perret as individual purported creditors, because that is what Mr. Leary and Mr. Perret have complained of in prior papers. Debtor was simply accommodating their request, as to which they now complain. Further, these purported creditors have “used” addresses in the United States in the past.

**Third Unnumbered Paragraph**

Debtor denies that the address mentioned in the Third Unnumbered Paragraph is the appropriate address or that it is even correct, for that matter, but will accommodate the purported creditors in the future and send notices to all possible addresses Debtor knows of that have been used by these purported creditors in the past. Further, if the purported creditors have designated an address for service, they cannot limit it to the purpose of “receiving notice in this bankruptcy proceeding only” - it must be an appropriate address for all purposes.

**Fourth Unnumbered Paragraph**

The allegations, inferences and conclusions contained in the Fourth Unnumbered Paragraph are denied except the noted bankruptcy code section speaks for itself. Any objection the purported creditors may have had as to notice or lack thereof has now been waived by their general appearances in this case.

**Fifth Unnumbered Paragraph**

The allegations, inferences and conclusions contained in the Fifth Unnumbered Paragraph are denied. Foreign creditors have other means available to them if they believe the mail service is taking too long to get to their addresses.

**Sixth Unnumbered Paragraph**

The Debtor admits that Mr. Leary intends to file a request for an audio recording, but denies the remaining allegations, inferences and conclusions thereof. The Debtor further denies that the purported creditors are entitled to any additional time in the premises.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that upon a hearing hereof, this Honorable Court will, to the extent necessary or even possible, deny this pleading and the relief requested therein. The Debtor prays for general relief.

This, the 21<sup>st</sup> day of July, 2016.

Respectfully submitted,

SLABBED NEW MEDIA, LLC

By Its Attorneys,  
LAW OFFICES OF CRAIG M. GENO, PLLC

By: /s/ Craig M. Geno  
Craig M. Geno

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to:

Christopher J. Steiskal, Esq.  
Office of the United States Trustee  
[christopher.steiskel@usdoj.gov](mailto:christopher.steiskel@usdoj.gov)

Mr. Charles L. Leary  
140 Trout Point Road  
E. Kemptville, NS B5A 5X9 CANADA

Mr. Vaughn Perret  
140 Trout Point Road  
E. Kemptville, NS B5A 5X9 CANADA

This, the 21<sup>st</sup> day of July, 2016.

/s/ Craig M. Geno